

1 Anna Y. Park, SBN 164242  
Anna.park@eeoc.gov  
2 Nakkisa Akhavan, SBN 286260  
Nakkisa.akhavan@eeoc.gov  
3 Taylor Markey, SBN 319557  
Taylor.markey@eeoc.gov  
4 Andrea E. Ringer, SBN 307315  
Andrea.ringer@eeoc.gov  
5 U.S. EQUAL EMPLOYMENT  
6 OPPORTUNITY COMMISSION  
7 255 East Temple Street, Fourth Floor  
8 Los Angeles, CA 90012  
9 Telephone: (213) 785-3080  
Facsimile: (213) 894-1301  
10

11 Attorneys for Plaintiff  
12 U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION

13 *Additional counsel on next page*  
14

15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**  
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18 U.S. EQUAL EMPLOYMENT  
19 OPPORTUNITY COMMISSION,

20 Plaintiff,

21 vs.

22 TECHSTYLE, INC.; TECHSTYLE  
23 VENTURES, LLC; FABLETICS,  
24 LLC; and DOES 1-10, inclusive,

25 Defendants.  
26  
27  
28

Case No.:

**COMPLAINT – TITLE VII**

- **EEO-1 VIOLATION**

1 Eric Yau, HI SBN 10087  
2 Eric.yau@eeoc.gov  
3 U.S. EQUAL EMPLOYMENT  
4 OPPORTUNITY COMMISSION  
5 300 Ala Moana Boulevard, Room 4-257  
6 Honolulu, HI 96850  
7 Telephone: (808) 800-2345  
8 Facsimile: (808) 541-3390

9 Attorney for Plaintiff  
10 U.S. EQUAL EMPLOYMENT  
11 OPPORTUNITY COMMISSION  
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## **NATURE OF THE ACTION**

This is an action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000 et seq. (“Title VII”), for an order directing Techstyle, Inc., Techstyle Ventures, LLC and Fabletics, LLC (collectively, “Defendants”) to prepare, execute, and file accurate and complete Employer Information Report EEO-1s (“EEO-1 reports”) as required by Section 709(c) of Title VII, 42 U.S.C. §2000e-8(c), and regulations issued thereunder, 29 C.F.R. §§1602.7 – 1602.14, for each calendar year for which Defendants are in violation of their reporting obligations. The U.S. Equal Employment Opportunity Commission (“Commission”) alleges that in prior reporting years, including calendar years 2019, 2020, 2021 and 2022, and despite written notices and demands from the Commission, Defendants have failed and refused to fully comply with their obligation to file such reports, in violation of said statute and regulations.

## **JURISDICTION AND VENUE**

1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451, 1331, 1337, and 1345. This action is authorized and instituted pursuant to 42 U.S.C. § 2000e-8(c) and regulations issued thereunder.

2. Venue in this Court is proper as Defendants are found, reside, or transact business within the jurisdiction of the United States District Court for the Central District of California.

## **PARTIES**

3. Plaintiff, the Commission, is an agency of the United States of America charged with the administration, interpretation, and enforcement of Title VII, and is expressly authorized to bring this action pursuant to 42 U.S.C. §2000e-8(c) and regulations issued thereunder, 29 C.F.R. §1602.9.

1           4.     At all relevant times, Defendants could be found, reside, or transact  
2 business within the State of California and the city of El Segundo, county of Los  
3 Angeles, and have continuously had at least 100 employees.

4           5.     At all relevant times, Defendants have continuously been an employer  
5 engaged in an industry affecting commerce within the meaning of Section 701(b),  
6 (g), and (h) of Title VII, 42 U.S.C. 2000e (b), (g), and (h).

7                               **STATEMENT OF CLAIMS**

8           6.     In 2019, Defendants had 100 or more employees.

9           7.     Defendants were under a duty to file an EEO-1 report for 2019.

10          8.     The Commission issued to Defendants notice of non-compliance and  
11 failure to file their required EEO-1 report for 2019.

12          9.     Defendants failed and refused to fully comply with their obligation to  
13 prepare, execute and file an accurate and complete EEO-1 report for 2019.

14          10.    As of the date of this action, Defendants never filed their required  
15 EEO-1 report for 2019.

16          11.    In 2020, Defendants had 100 or more employees.

17          12.    Defendants were under a duty to file an EEO-1 report for 2020.

18          13.    The Commission issued to Defendants notice of non-compliance and  
19 failure to file their required EEO-1 report for 2020.

20          14.    Defendants failed and refused to fully comply with their obligation to  
21 prepare, execute and file an accurate and complete EEO-1 report for 2020.

22          15.    As of the date of this action, Defendants never filed their required  
23 EEO-1 report for 2020.

24          16.    In 2021, Defendants had 100 or more employees.

25          17.    Defendants were under a duty to file an EEO-1 report for 2021.

26          18.    The Commission issued to Defendants notice of non-compliance and  
27 failure to file their required EEO-1 report for 2021.

19. Defendants failed and refused to fully comply with their obligation to prepare, execute and file an accurate and complete EEO-1 report for 2021.

20. As of the date of this action, Defendants never filed their required EEO-1 report for 2021.

21. In 2022, Defendants had 100 or more employees.

22. Defendants were under a duty to file an EEO-1 report for 2022.

23. The Commission issued to Defendants notice of non-compliance and failure to file their required EEO-1 report for 2022.

24. Defendants failed and refused to fully comply with their obligation to prepare, execute and file an accurate and complete EEO-1 report for 2022.

25. As of the date of this action, Defendants never filed their required EEO-1 report for 2022.

26. Defendants' failure and refusal to file said EEO-1 reports is in violation of Section 709(c) of Title VII, 42 U.S.C. §2000e-8(c), and regulations issued thereunder, 29 C.F.R. §§1602.7 – 1602.14.

## **PRAYER FOR RELIEF**

Wherefore, the Commission respectfully requests that this Court:

A. Order that Defendants, without further delay, shall prepare, execute, and file accurate and complete EEO-1 reports as required by law for each prior calendar year for which they have failed to file requisite reports, including 2019, 2020, 2021 and 2022;

B. Order that Defendants file accurate and complete EEO-1 reports as required by law for each calendar year in the future;

C. Grant such further relief as the Court deems necessary and proper in the public interest; and

D. Award the Commission its costs of this action.

1 Dated: August 26, 2024

Respectfully Submitted,

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3 KARLA GILBRIDE,  
4 General Counsel  
5 Washington, DC

6 CHRISTOPHER LAGE,  
7 Deputy General Counsel  
8 Washington, DC

9 By:



10 ANNA Y. PARK,  
11 Regional Attorney  
12 Los Angeles District Office

13 U.S. EQUAL EMPLOYMENT  
14 OPPORTUNITY COMMISSION